

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Case No: 1:16-cv-00563 (PTG/WBP)

**PLAINTIFFS' MOTION FOR LEAVE TO SUBMIT A SUPPLEMENTAL  
MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE THE  
OPINIONS OF WILLIAM A.V. CLARK**

To further address questions the Court raised at the January 22, 2025 motions hearing, Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs"), by counsel, move for leave to submit the concise, four-point supplemental memorandum attached hereto as Exhibit 1 in opposition to Defendants' motion to exclude the opinions of William A.V. Clark (ECF 495). A proposed order is attached hereto.

WHEREFORE, Plaintiffs ask the Court to grant this motion and allow Plaintiffs to file the attached supplemental memorandum.

Dated: January 28, 2025

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of January, 2025, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/ Granville C. Warner

Granville C. Warner, VSB #24957